

COOLEY LLP
BOBBY GHAJAR (198719)
(bghajar@cooley.com)
TERESA MICHAUD (296329)
(tmichaud@cooley.com)
COLETTE GHAZARIAN (322235)
(cghazarian@cooley.com)
1333 2nd Street, Suite 400
Santa Monica, California 90401
Telephone: (310) 883-6400
MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
JUDD LAUTER (290945)
(jlauter@cooley.com)
ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
(adunning@cgsh.com)
1841 Page Mill Road, Suite 250
Palo Alto, CA 94304
Telephone: (650) 815-4131

Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation,
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE
IN SUPPORT OF META'S ADMINISTRATIVE
MOTION AND [PROPOSED] ORDER TO FILE
UNDER SEAL RE: META'S MOTION FOR
SUMMARY JUDGEMENT AND OPPOSITION
TO PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT**

I, Michelle Woodhouse, hereby declare:

1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I provide this Declaration based on my personal knowledge and/or after a reasonable investigation of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

2. Pursuant to Civil L.R. 79-5(f)(3), I make this Declaration in support of Meta’s Administrative Motion to File Under Seal Meta’s Motion for Summary Judgment and Opposition to Plaintiffs’ Motion for Partial Summary Judgment and accompanying exhibits, (“Sealing Motion”). Meta seeks leave to file under seal portions of materials accompanying Meta’s Motion for Summary Judgment and Opposition to Plaintiffs’ Motion for Partial Summary Judgment (“Summary Judgment Motion”).

3. Meta requests the Court’s permission to file under seal narrowly tailored portions of a subset of the exhibits accompanying the Summary Judgment Motion, as set forth in the chart below alongside the relief requested for each:

Document	Sealing Request
Woodhouse Ex. A – Ex. 22 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. B – Ex. 26 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. C – Ex. 27 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. D – Ex. 31 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. E – Ex. 32 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. F – Ex. 35 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. G – Ex. 40 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. H – Ex. 42 to the Ghajar Declaration	Portions annotated in BLUE boxes

Woodhouse Ex. I – Ex. 44 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. J – Ex. 46 to the Ghajar Declaration	Portions annotated in BLUE boxes
Woodhouse Ex. K – Ex. 50 to the Ghajar Declaration	Portions annotated in BLUE boxes

Meta seeks the Court’s permission to file under seal discrete portions of **Woodhouse Exhibits A-K**, as further explained below.

4. Attached as **Woodhouse Exhibit A** is Exhibit 22 to the Ghajar Declaration with Meta’s proposed narrowly tailored redactions. Meta respectfully seeks to redact hyperlinks or file paths (*e.g.*, links to access Meta’s internally stored documents and data) that point to Meta’s confidential and proprietary information and sensitive features of its internal systems. These materials are maintained with restricted access in the ordinary course of Meta’s business and are not generally known to the public or Meta’s competitors. The hyperlinks and file paths have been redacted in a limited way to avoid disclosure, while preserving sufficient information for the public to understand any relevance of the same. Disclosure of this confidential and proprietary information about Meta’s infrastructure may increase the risk of cyber security threats or breaches as third parties may seek to gain access to and use the information to compromise and intrude upon Meta’s internal systems and other confidential information. Meta previously requested to seal documents based on the same concerns regarding network security, (*e.g.*, Dkt. 391-1, ¶ 9), which was granted by the Court, (*e.g.*, Dkt. 393). To the extent Plaintiffs claim additional confidentiality to Exhibit 22 to the Ghajar Declaration, Meta takes no position on Plaintiffs’ confidential information, but seeks to file this document entirely under seal out of abundance of caution.

5. Attached as **Woodhouse Exhibit B** is Exhibit 26 to the Ghajar Declaration with Meta’s proposed narrowly tailored redactions. Meta respectfully seeks to redact two types of information. **First**, Meta respectfully seeks to redact materials comprising employees’ personal identifiable information, namely, the home address for Meta’s individual employees, who are not parties to the case. Such information has been redacted to protect the employees’ privacy and to

1 avoid the risk of third parties' unauthorized and/or illicit use of the information, such as for
2 automated or unwanted solicitation or contact. Meta previously requested to seal documents based
3 on personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was granted by the Court, (*e.g.*,
4 Dkt. 393). **Second**, Meta respectfully seeks to redact information necessary to prevent the
5 disclosure of Meta's financial information, including Meta's internal financial considerations such
6 as costs, budgets, and estimated revenues. Maintaining the confidentiality of Meta's non-public
7 financial information is critical to Meta's business. Disclosure of such information, such as non-
8 public forecasts of revenues and costs associated with specific projects or ventures, risks
9 competitive harm to Meta, including by providing competitors and potential counterparties insight
10 into Meta's financial analyses and business strategies.

11 6. Attached as **Woodhouse Exhibit C** is Exhibit 27 to the Ghajar Declaration with
12 Meta's proposed redaction of a document and narrowly tailored redactions to deposition testimony.
13 Meta respectfully seeks to redact information necessary to prevent the disclosure of Meta's
14 financial information, including Meta's internal financial considerations and decisions regarding
15 business development such as budgets, product costs, and estimated revenues. Maintaining the
16 confidentiality of Meta's non-public financial information is critical to Meta's business. Disclosure
17 of such information, such as non-public forecasts of revenues and costs associated with specific
18 projects or ventures, risks competitive harm to Meta, including by providing competitors and
19 potential counterparties insight into Meta's financial analyses and business strategies.

20 7. Attached as **Woodhouse Exhibit D** is Exhibit 31 to the Ghajar Declaration with
21 Meta's proposed narrowly tailored redactions. Meta respectfully seeks to redact three types of
22 information. **First**, Meta respectfully seeks to redact materials comprising an employee's personal
23 identifiable information, namely, the home address for Meta's individual employee, who is not a
24 party to the case. Such information has been redacted to protect the employee's privacy and to
25 avoid the risk of third parties' unauthorized and/or illicit use of the information, such as for
26 automated or unwanted solicitation or contact. Meta previously requested to seal documents based
27 on personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was granted by the Court, (*e.g.*,
28 Dkt. 393). **Second**, Meta respectfully seeks to redact only information necessary to prevent the

1 disclosure of the monetary terms of an agreement between Meta and a third party, which is subject
2 to confidentiality and non-disclosure obligations and agreements. Disclosure of such information
3 would put the third party's confidential information at risk and pose a competitive disadvantage to
4 Meta and the third party who obtained promises of confidentiality from Meta for this information
5 and is not party to this lawsuit. Meta previously requested to seal documents based on the similar
6 third-party information, (*e.g.*, Dkt. 391-1, ¶ 6), which was granted by the Court, (*e.g.*, Dkt. 393).
7 **Third**, Meta also respectfully seeks to redact information necessary to prevent the disclosure of the
8 identity of third-parties (who are not parties to this lawsuit), where Meta has entered into and are
9 subject to confidentiality and non-disclosure obligations and agreements, where these third-parties
10 obtained promises of confidentiality from Meta. Disclosure of such information would put the third
11 party's confidential information at risk. To the extent the Court believes the identity of these third-
12 parties should be made public, Meta requests that the Court allow these third parties an opportunity
13 to put in their own declaration justifying confidentiality. Meta has previously requested to seal
14 documents based on similar third-party information, (*e.g.*, Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which
15 this Court has granted, (*e.g.*, Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).)

16 8. Attached as **Woodhouse Exhibit E** is Exhibit 32 to the Ghajar Declaration with
17 Meta's proposed narrowly tailored redactions. Meta respectfully seeks to redact materials
18 comprising an employee's personal identifiable information, namely, the home address for Meta's
19 individual employee, who is not a party to the case. Such information has been redacted to protect
20 the employee's privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
21 information, such as for automated or unwanted solicitation or contact. Meta previously requested
22 to seal documents based on personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was
23 granted by the Court, (*e.g.*, Dkt. 393).

24 9. Attached as **Woodhouse Exhibit F** is Exhibit 35 to the Ghajar Declaration with
25 Meta's proposed narrowly tailored redactions. Meta respectfully seeks to redact materials
26 comprising an employee's personal identifiable information, namely, the home address for Meta's
27 individual employee, who is not a party to the case. Such information has been redacted to protect
28 the employee's privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the

1 information, such as for automated or unwanted solicitation or contact. Meta previously requested
2 to seal documents based on personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was
3 granted by the Court, (*e.g.*, Dkt. 393).

4 10. Attached as **Woodhouse Exhibit G** is Exhibit 40 to the Ghajar Declaration with
5 Meta's proposed narrowly tailored redactions. Meta respectfully seeks to redact materials
6 comprising an employee's personal identifiable information, namely, the home address for Meta's
7 individual employee, who is not a party to the case. Such information has been redacted to protect
8 the employee's privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
9 information, such as for automated or unwanted solicitation or contact. Meta previously requested
10 to seal documents based on personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was
11 granted by the Court, (*e.g.*, Dkt. 393).

12 11. Attached as **Woodhouse Exhibit H** is Exhibit 42 to the Ghajar Declaration with
13 Meta's proposed narrowly tailored redactions. Meta respectfully seeks to redact materials
14 comprising an employee's personal identifiable information, namely, the home address for Meta's
15 individual employee, who is not a party to the case. Such information has been redacted to protect
16 the employee's privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
17 information, such as for automated or unwanted solicitation or contact. Meta previously requested
18 to seal documents based on personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was
19 granted by the Court, (*e.g.*, Dkt. 393).

20 12. Attached as **Woodhouse Exhibit I** is Exhibit 44 to the Ghajar Declaration with
21 Meta's proposed narrowly tailored redactions. Meta respectfully seeks to redact materials
22 comprising an employee's personal identifiable information, namely, the home address for Meta's
23 individual employee, who is not a party to the case. Such information has been redacted to protect
24 the employee's privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
25 information, such as for automated or unwanted solicitation or contact. Meta previously requested
26 to seal documents based on personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was
27 granted by the Court, (*e.g.*, Dkt. 393).

28 13. Attached as **Woodhouse Exhibit J** is Exhibit 46 to the Ghajar Declaration with

1 Meta's proposed narrowly tailored redactions. Meta respectfully seeks to redact materials
2 comprising an employee's personal identifiable information, namely, the home address for Meta's
3 individual employee, who is not a party to the case. Such information has been redacted to protect
4 the employee's privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
5 information, such as for automated or unwanted solicitation or contact. Meta previously requested
6 to seal documents based on personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was
7 granted by the Court, (*e.g.*, Dkt. 393).

8 14. Attached as **Woodhouse Exhibit K** is Exhibit 50 to the Ghajar Declaration with
9 Meta's proposed narrowly tailored redactions. Meta respectfully seeks to redact only materials
10 related to datasets that were used to train the Llama models, which has not been disclosed publicly.
11 Meta regards the combination of datasets (in essence the data "recipe" used for training) to be
12 confidential and competitively sensitive information, as knowing the mixture of datasets used by
13 Meta would enable competitors to more easily duplicate or replicate the Llama models. In fact, the
14 rationale for the confidentiality of the identity of these datasets is explained in the Interrogatory
15 response, which describes the various factors by which Meta evaluated and decided to include
16 certain datasets for Llama training. Additionally, some of these datasets involve annotations that
17 are not publicly available and/or that were created pursuant to agreements between Meta and third
18 parties. Because there is no allegation that these other datasets contain copies of Plaintiffs' works,
19 Meta does not believe that any of the datasets subject to proposed redactions are relevant to this
20 case. Meta previously requested to seal documents based on the same datasets, (*e.g.*, Dkt. 409-
21 1, ¶ 12), which was granted by the Court, (*e.g.*, Dkt. 414).

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed in San Jose, California on this 24th day of March 2025.

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5 
6 Michelle Woodhouse